

November 12, 1998

Re: Call-in Technical Inquiry 0419 – Ranking System to Prioritize Sites with Indicators of Environmental Contamination

Dear NEPA User:

This letter is in response to your October 19, 1998, request for a ranking system for potential indicators of environmental contamination. In a previous Technical Inquiry (TI), NEPA Call-In provided you with a list of potential indicators of environmental contamination. You have used this list to create a checklist that you will be sending to the GSA regions for them to evaluate their current holdings.

NEPA Call-In reviewed the list and, based on staff experience creating similar lists for contaminated sites, made several modifications to the list. Under Section I, Identifying Information, NEPA Call-In added a new question "G," "Is the site currently undergoing any environmental investigation or cleanup, or under a State or Federal order to do so? In addition, Section II identification of previous owner was changed to Section I question "H," "Previous Owner," and a new Section II question was inserted (presented below).

To score the checklist, NEPA Call-In created the following methodology, the objective of which is to differentiate between:

1. sites with a low probability of significant environmental contamination,
2. sites where hazardous materials were probably used and have a moderate chance of significant environmental contamination, and
3. sites where hazardous materials were likely used and evidence suggests a high probability of significant environmental contamination.

Each site would receive a score from 0 to 100. The minimum potential site score is 0 (very low probability of significant environmental contamination based on previous use and site observations) and the maximum potential site score is 100 (high probability of significant environmental contamination based on previous use and evidence suggesting a release of these substances into the environment).

Each checklist will be scored according to the following system:

For Section II, Facility Type, if the use indicates industrial use, such as a facility where vehicle or equipment maintenance was performed, a warehouse which may have stored chemicals, a depot, or landfill, the site should receive 25 points. If the use indicates non-industrial use, such as an office building, the site receives 0 points for this section.

For Section III, Previous Uses, for each "YES" answer score 5 points to a maximum of 25 points. For example, if a site has received 5 or more "YES" answers, it should receive the maximum score of 25 points for Section III. Item "M," Other, should be evaluated and a subjective score assigned according to the probability of hazardous substance use.

For Section IV, Indicators of Environmental Contamination, "YES" answers for questions "C" and "E" should receive 5 points. For all other "YES" answers, score 10 points to a maximum of 50 points. For example, if a site received 5 or more 10-point "YES" answers, it should receive the maximum score of 50 points for Section IV. Item "EE," Other, should be evaluated and a subjective score assigned according to the probability of hazardous substance use.

Add the total scores for Sections II, III, and IV for the total site score. Sites with a low probability of significant environmental contamination are expected to score below 30 points. Sites where hazardous materials were likely used and evidence suggests a release of these substances into the environment are expected to score at 80 points or above. Sites between 30 and 80 may have environmental contamination present and should be investigated further, with priority on the highest scoring sites.

The materials in this TI have been prepared for use by GSA employees and contractors and are made available at this site only to permit the general public to learn more about NEPA. The information is not intended to constitute legal advice or substitute for obtaining legal advice from an attorney licensed in your state and may or may not reflect the most current legal developments. Readers should also be aware that this response is based upon laws, regulations, and policies in place at the time it was prepared and that this response will not be updated to reflect changes to those laws, regulations and policies.

Sincerely,

(Original Signed)

NEPA Call-In Researcher